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From:

Sent: Wednesday, February 01, 2012 8:44:10 AM

To: Cc:

Subject: RE: Issue

Reallocation of partnership items in accordance with the partnership special allocation agreement is a partnership item under Treas. Reg. 301.6231(a)(3)-1(a) that must be reflected in the FPAA in order to have effect. I understand that the FPAA has done that. That is the bare minimum that is required.